



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

86 Chambers Street  
New York, NY 10007

November 19, 2024

BY ECF

The Honorable Alvin K. Hellerstein  
United States District Court  
United States District Judge  
500 Pearl Street  
New York, NY 10007

*The schedule is accepted.*  
*11.21.24*  
*[Signature]*

Re: *Knight First Amendment Institute at Columbia University v. U.S. Department of State*, No. 23 Civ. 02513 (AKH)

Dear Judge Hellerstein:

We write on behalf of Defendant the United States Department of State (the "State Department" or the "Government") and Plaintiff the Knight First Amendment Institute at Columbia University (the "Institute") to provide a status update in the above referenced Freedom of Information Act ("FOIA") lawsuit.

Since filing their last joint status report on September 20, 2024 (ECF No. 28), the parties agreed to a processing rate for the remaining 894 pages that are potentially responsive to Request No 1. In an email dated September 27, 2024, the State Department informed the Institute that it will process those documents on average at a rate of 450 pages every six weeks.

On September 27, 2024, the State Department sent the Institute a release letter advising it had processed 72 pages determined to be potentially responsive. Of those pages, the State Department released 7 pages in full, released 32 pages in part, and withheld 33 pages in full.

On November 8, 2024, the State Department sent the Institute a release letter advising it had processed 7 pages determined to be potentially responsive. Of those pages, the State Department released 3 pages in full, and released 4 pages in part.

Based on the parties' agreed upon processing rate, the State Department expects to complete processing all remaining records and expects to make its final production by December 20, 2024.

The parties propose submitting their next joint status report on January 31, 2025, to give the Institute time to assess the adequacy of the State Department's productions and to give the parties time to then consult regarding next steps.

\* \* \*

We thank the Court for its attention to this matter.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

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